

of New York regarding any of the allegations made by the plaintiffs in their complaints, or that any of the plaintiffs' rights under the Federal or New York Constitutions or Statutes had been violated.

A review of the officer's Central Personnel Index (CPI) revealed the following:

1. On February 21, 2012, Lieutenant Haitham Hussameldin had a substantiated departmental investigation for misuse of time which resulted in the filing of charges and specifications. In 2013, he pled guilty to the charges and specifications and forfeited fifteen (15) vacation days and two (2) hours of his accrued time/leave balances as a disciplinary penalty for his conduct, namely, for wrongfully causing false entries to be made in department records on numerous dates by leaving his assigned command earlier than the time he was reporting on his time sheets, and for submitting an overtime form and receiving compensation for two (2) hours that he did not work. As part of the penalty that was imposed for his conduct, he was also transferred for caused to another Precinct.
2. On April 22, 2019, Lieutenant Haitham Hussameldin had a substantiated departmental investigation for an invoice discrepancy and for failing to prepare a complete/accurate report, namely, a property clerk invoice. The CPI did not list what disciplinary actions were taken as a result of the above-described conduct.

The People reserve the right to move in limine to preclude reference to this information, or otherwise to object to its use or introduction into evidence during trial.

Should you wish to discuss this matter, please do not hesitate to call me at [REDACTED] [REDACTED] Ext.] during office hours.

Sincerely,

[REDACTED]
[REDACTED]

cc: Clerk of the Court